

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

SOUTHERN District of GEORGIASTATESBORO Division**CV 622-048**

Case No.

(to be filled in by the Clerk's Office)

MICHAEL DESHAUN WILLIAMS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

FREDERICK CARVER
TRANE TECHNOLOGIES COMPANY LLC
INGERSOLL RAND INC.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one)

☐ Yes☒ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name MICHAEL DESHAUN WILLIAMS
 Address P.O. Box 263
Glenwood GA 30428
City State Zip Code
 County Wheeler
 Telephone Number 912-314-4044
 E-Mail Address MW77777@icloud.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name FREDERICK CARVER
 Job or Title (if known) Maintenance Supervisor at Trane Technologies
 Address 712 McNair St.
Vidalia GA 30479
City State Zip Code
 County Toombs
 Telephone Number 912-805-0177
 E-Mail Address (if known) unknown
☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name TRANE TECHNOLOGIES COMPANY LLC
 Job or Title (if known) HVAC Company
 Address 800-E Beatty Street Building B
Davidson NC 28036
City State Zip Code
 County Mecklenburg County
 Telephone Number 704-655-4000
 E-Mail Address (if known) unknown
☒ Individual capacity ☒ Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

INGERSOLL RAND INC/PLC

Job or Title (if known)

manufacturing/HVAC company

Address

800-E Beatty Street

Davidson

City

NC

State

28036

Zip Code

County

Mecklenburg County

Telephone Number

414-212-4700

E-Mail Address (if known)

unknown



Individual capacity



Official capacity

Defendant No. 4

Name

N/A

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

N/A

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

N/A

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

The event occurred at the Trane Technologies facility in Vidalia, Ga.

- B. What date and approximate time did the events giving rise to your claim(s) occur?

The date and time of the event was: March 12th 2020 - April 9th 2020. Approx. 2:30 p.m.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

On March 12th of 2020 at approx. 2:30 p.m., Trane Technologies Company LLC employee Fred Carver told me that he would make me a permanent Trane employee in 3 weeks at a pay rate of \$18 per hour. I agreed to that. After 3 weeks I was not made a permanent Trane employee with a pay rate of \$18 per hour. When I was not made a permanent Trane employee at a pay rate of \$18 per hour within 3 weeks, as promised, our implied contract was breached. Only Fred Carver and I were involved in this implied contract. There were no witnesses to the deal/agreement.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

As a result of the breach of the implied contract between myself and Fred Carver, I was denied participation in the Trane grant program where Trane gave out over a million dollars in grants, unable to join the "Be Well" program that gave permanent Trane employees thousands of dollars, unable to get holiday work pay bonuses, unable to apply for higher paying, higher status positions as a permanent Trane Technologies employee.

Unjust enrichment.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I command any judge that presides over this case to grant a judgement in my favor for the following:

1. 100% of INGERSOLL RAND INC stock.
2. All of INGERSOLL RAND INC's intellectual property.
3. All of INGERSOLL RAND INC's sub and sibling companies.
4. \$3 Billion in Ethereum (TRANE TECHNOLOGIES COMPANY LLC's insurance will pay this)
5. \$2 Million from FREDERICK CARVER.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7/7/2022

Signature of Plaintiff

Printed Name of Plaintiff

Michael Deshaun Williams
MICHAEL DESHAUN WILLIAMS

B. For Attorneys

Date of signing: N/A

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

AO 398 (Rev. 01/09) Notice of a Lawsuit and Request to Waive Service of a Summons

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF GEORGIA

<u>MICHAEL DESHAUN WILLIAMS</u> Plaintiff)	
<u>FREDERICK CARVER v. INGERSOLL RAND INC</u> <u>TRANE TECHNOLOGIES COMPANY LLC</u> Defendant)	Civil Action No.

NOTICE OF A LAWSUIT AND REQUEST TO WAIVE SERVICE OF A SUMMONS

To: FREDERICK CARVER, TRANE TECHNOLOGIES COMPANY LLC, INGERSOLL RAND INC.
 (Name of the defendant or - if the defendant is a corporation, partnership, or association - an officer or agent authorized to receive service)

Why are you getting this?

A lawsuit has been filed against you, or the entity you represent, in this court under the number shown above. A copy of the complaint is attached.

This is not a summons, or an official notice from the court. It is a request that, to avoid expenses, you waive formal service of a summons by signing and returning the enclosed waiver. To avoid these expenses, you must return the signed waiver within 30 days (give at least 30 days, or at least 60 days if the defendant is outside any judicial district of the United States) from the date shown below, which is the date this notice was sent. Two copies of the waiver form are enclosed, along with a stamped, self-addressed envelope or other prepaid means for returning one copy. You may keep the other copy.

What happens next?

If you return the signed waiver, I will file it with the court. The action will then proceed as if you had been served on the date the waiver is filed, but no summons will be served on you and you will have 60 days from the date this notice is sent (see the date below) to answer the complaint (or 90 days if this notice is sent to you outside any judicial district of the United States).

If you do not return the signed waiver within the time indicated, I will arrange to have the summons and complaint served on you. And I will ask the court to require you, or the entity you represent, to pay the expenses of making service.

Please read the enclosed statement about the duty to avoid unnecessary expenses.

I certify that this request is being sent to you on the date below.

Date: 7/7/2022

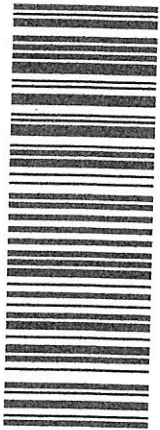
Michael Deshaun Williams
 Signature of the attorney or unrepresented party
MICHAEL DESHAUN WILLIAMS
 Printed name

P.O. Box 263 Glenwood, Ga. 30428
 Address

mw7777@icloud.com
 E-mail address

912-314-4044
 Telephone number

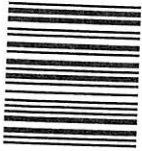
Michael DeShawn Williams
P.O. Box 263
Glenwood, Ga 30428



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United States District Court Savannah

Attention: Clerk of Court (Statesboro)

P.O. Box 8286

Savannah, Georgia ~~30408~~ 31412

RECEIVED

U.S. Marshals Service
Savannah, Georgia